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12 LOANSTREAM MORTGAGE

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13 UNITED STATES DISTRICT COURT

14 CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION

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KIMBERLY HUDSON-BRYANT,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

OCMBC, INC. dba LOANSTREAM,
PREMIER FINANCIAL MARKETING
LLC D/B/A RESMO LENDING, AND
SEAN ROBERTS

Defendants.

Case No. 8:24-cv-00067-FWS-JDE

**DECLARATION OF THOMAS F.
LANDERS IN SUPPORT OF JOINT
MOTION AND STIPULATION TO
CONTINUE CASE DEADLINES**

Judge: Hon. Fred W. Slaughter

Magistrate: Hon. John D. Early

Action Filed: January 11, 2024

Trial Date: May 12, 2026

1 I, Thomas F. Landers, declare:

2 1. I am an attorney at law licensed to practice before all federal and state
3 courts in the State of California and am a partner with Solomon Ward Seidenwurm &
4 Smith, LLP (“SWSS”), counsel for Defendant OCMBC, INC. dba LOANSTREAM
5 MORTGAGE (“LoanStream”) in this action. I have personal knowledge of the facts
6 set forth in this declaration and I submit this declaration in support of the Parties’ Joint
7 Motion and Stipulation to Continue Case Deadlines (“Stipulation”).

8 2. Plaintiff filed a class action complaint on or about January 1, 2024.

9 3. After conducting certain discovery, on September 10, 2024, Plaintiff
10 filed a first amended complaint (“FAC”) and named two additional defendants. (ECF
11 No. 37).

12 4. Shortly thereafter, the Parties requested an extension of all case deadlines
13 to properly investigate and address the new allegations in the FAC and to allow the
14 new parties to participate in the case. (ECF No. 40).

15 5. On October 24, 2024, the Court issued a revised scheduling order
16 (“Scheduling Order”). (ECF No. 48).

17 6. On April 28, 2025, the Court issued its Order re Joint Motion and
18 Stipulation to Continue Case Deadlines (“Revised Scheduling Order”) (ECF No. 50).
19 The primary reason the Parties requested the Revised Scheduling Order was because
20 a key witness in the case had been involved in a traffic accident that resulted in the
21 witness’ unavailability. Later, and as discussed in the accompanying declaration of
22 Andrew R. Perrong, Plaintiff’s availability to participate in the case was impacted by
23 her husband’s surgery and recuperation.

24 7. Based on the above described health-related witness and party related
25 unavailability, the Court issued its MODIFIED Order Re Joint Motion and Stipulation
26 to Continue Case Deadlines (“Modified Scheduling Order”) on June 25, 2025, which
27 further continued the non-expert discovery cut-off to October 9, 2025, and continued
28 related litigation dates (ECF No. 52). Those issues still exist.

1 8. Since the Court issued the Revised Scheduling Order and Modified
2 Scheduling Order, the Parties have continued to engage in substantial written and oral
3 discovery, but those efforts are not yet complete. Plaintiff's availability remains
4 impacted by her status as her husband's primary caregiver during his recuperation.
5 Further, a key witness, who is both a percipient and 30(b)(6) witness for LoanStream,
6 remains unavailable due to a traffic incident that resulted in the witness being
7 unavailable to testify in this case to date. This witness's testimony is important to both
8 the Plaintiff's and Defendants' cases, and may result in additional needed discovery.

9 9. For the reasons set forth herein, and to conserve time and judicial
10 resources, the Parties believe that a 120-day extension of all deadlines will allow the
11 Parties to properly complete discovery and prepare for trial.

12 I declare under penalty of perjury under the laws of the State of California that
13 the foregoing is true and correct, and that this declaration was executed on September
14 23, 2025, at San Diego, California.

/s/ Thomas F. Landers
Thomas F. Landers, Esq.